

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**LISSA MEL,
a/k/a “Monica Sanders,”**

Defendant

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NO. 8:18-cr-00571-TDC

JOINT STATUS REPORT AND CONSENT MOTION FOR SPEEDY TRIAL WAIVER

The United States and the Defendant, Lissa Mel, by and through counsel, respectfully submit the following Joint Status Report as required by the Court’s Order of December 14, 2018 [Dkt. 37]. In accordance with this Court’s Order, the parties have conferred regarding the status of this litigation.

Status of Litigation

Over the past few weeks, the parties have engaged in extensive discussions on a proposal to resolve this matter. The parties have reached an agreement in principle on many of the substantive issues but respectfully submit that they require additional time to attempt to reach consensus on a small number of discrete issues. The parties believe that an additional, short adjournment would allow the parties to work through these issues and reach a disposition or, in the event that does not happen, to determine that no such resolution will be possible and to proceed accordingly.

As such, the parties respectfully request that this Court set the case for arraignment in late January 2019. The parties propose the following dates/times for the hearing: January 28, 2019 at or before 11 a.m. or at any time on January 29, 2019.

Waiver of Speedy Trial

The parties further request, pursuant to 18 U.S.C. § 3161(c) and (h)(7) and for the reasons set forth in the previous motion [Dkt. 38], that this Court issue an order continuing the arraignment on the Information and excluding time under the Speedy Trial Act. The parties respectfully submit that it remains in their mutual interest to delay the arraignment to discuss the possibility of a resolution of this matter in advance of further proceedings and that such an exclusion of time is appropriate because (i) the Defendant consents and (ii) “the ends of justice [would be] served” by providing the parties this additional time to move this matter toward a resolution short of a trial. *See* 18 U.S.C. § 3161(c)(1) and (h)(7)(A).

Accordingly, the parties request that this Court exclude time under the Speedy Trial Act from January 4, 2019 through the scheduled arraignment. Attached for the Court's review and convenience is a proposed order that conforms to the relief requested herein.

Respectfully submitted,

SANDRA MOSER
Acting Chief, Fraud Section
Criminal Division
U.S. Department of Justice

By: /s/

Tracee Plowell, Assistant Chief
Ankush Khardori, Trial Attorney
Fraud Section, Criminal Division
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CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2019, I filed the foregoing with the Clerk of the Court and provided a copy to counsel for the Defendant.

/s/

Tracee Plowell
Assistant Chief
Fraud Section, Criminal Division
United States Department of Justice